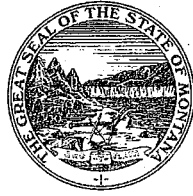


OFFICE OF PUBLIC INSTRUCTION

STATE OF MONTANA

Denise Juneau
Superintendent



www.opi.mt.gov
(406) 444-5643

July 21, 2016

Chris Minnich
Executive Director
Council of Chief State School Officers
One Massachusetts Avenue, NW, Suite 700
Washington, DC 20001-1431

Dear Mr. Minnich,

I am writing to share concerns about the burden placed on Montana school districts by the biennial Office of Civil Rights Data Collection (CRDC). I am seeking the advocacy of the Council of Chief State School Officers (CCSSO) in working with the OCR to reevaluate this collection and to support local schools districts and states by making this a more reasonable process resulting in meaningful and useable information to schools, states, lawmakers and researchers.

Completing the CRDC is the responsibility of Local Education Agencies (LEAs). Montana LEAs have sought the support of my agency in completing the CRDC because:

- Completing the CRDC is expensive and burdensome.
- LEAs perceive that the CRDC data is duplicative to data collected already for federal and state purposes.

OPI recently completed a thorough analysis of the CRDC. Key findings of this analysis were:

- The CRDC consists of 1,849 data elements – more data elements than are contained in the 37 data collections the OPI conducts with all schools.
- Montana schools expend approximately \$450,000 in personnel every two years to complete the CRDC.
- A few State Education Agencies (SEAs) have developed systems to complete some or all of the CRDC for their LEAs; my agency would have to undertake a sizeable project to provide the aid sought by LEAs. A key factor would be the need to aggregate student data by school rather than school district which is typical for the Office of Public Instruction (OPI). A first step would be to map the OPI data elements to the CRDC to determine how much of the data does reside in OPI systems.

Chris Minnich

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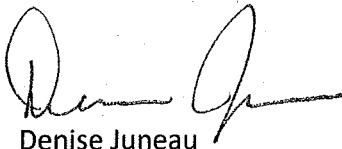
July 20, 2016

The CRDC has been in place since 1968 and has changed over time. Given that the burden borne by Montana schools is repeated throughout the nation, the OPI would like the CCSO advocacy to question the benefits of the CRDC with the OCR:

- Are we asking the correct questions to ascertain whether or not our nation's schools are providing equal educational opportunities to all students?
- What evidence do we have that the OCR data is useful?
- Is the data we are collecting the right data to answer this question? Could the OCR reduce the data requirements?
- Will the USED consider grants to SEAs to integrate existing federal data collections with the CRDC?

Thank you for your time and attention to this important issue affecting Montana schools and the OPI.

Sincerely,

A handwritten signature in black ink, appearing to read "Denise Juneau", with a stylized, flowing script.

Denise Juneau

Superintendent of Public Instruction